

SEP 20 2012

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[REDACTED]



did knowingly combine, conspire, confederate and agree, with each other and with other persons known and unknown to the Grand Jury, to commit offenses against the United States, that is: to transport undocumented aliens within the United States, in any manner whatsoever, for the purpose of commercial advantage and private financial gain, knowing and in reckless disregard of the fact that such aliens had entered the United States in violation of law, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(I), and 1324(a)(1)(B)(i).

**Manner and Means of the Conspiracy**

1. The defendants, herein as illegal alien smugglers, obtain profits transporting illegal aliens from Mexico into and throughout the United States. Alien smugglers often use various types of vehicles. The smugglers have established networks with other alien smugglers who bring aliens into the United States, illegally, across the Southwest border. Smuggled aliens are often required to either pay a fee for their transport, or smuggle narcotics across the border as payment for the smuggler services.
2. Alien smugglers transport vehicles, often referred to as "burras", to the Southwest border

where individuals responsible for smuggling the aliens across the border, often referred to as “coyotes”, will load illegal aliens. From there, the “coyotes”, the alien smugglers, or accomplices will drive the vehicles loaded with aliens towards Border Patrol checkpoints located in the interior of Border States. Aliens will then exit the vehicles, walk around the checkpoints in order to avoid detection, and rejoin the vehicles at a point past the Border Patrol. Alien smugglers will then transport the aliens further into the United States.

3. Alien smugglers use coded terms to describe their methods of smuggling aliens and contraband. The smugglers engage in telephonic communications with their network of associates in order to facilitate the movement of aliens and contraband.

#### Overt Acts

In furtherance of the conspiracy described herein, one or more of the co-conspirators committed, in the Southern District of Texas and elsewhere, one or more of the following overt acts:

- a. On or about September 20, 2011, [REDACTED] was travelling to Houston with a load of illegal aliens. [REDACTED] called his wife and told her that he was scouting for law enforcement and did not have aliens in his car.

- b. From on or about September 20, 2011 through September 23, 2011, [REDACTED]  
[REDACTED]  
[REDACTED]  
in multiple vehicles, or “burras”, between Houston, Texas and the Texas/Mexico

border smuggling illegal aliens and narcotics. [REDACTED]

[REDACTED] called each other using a conference call, as they moved two groups of illegal aliens.

c. On or about September 28, 2011, [REDACTED] called [REDACTED] and spoke about how much they would be paid for smuggling aliens and narcotics into the United States. [REDACTED] drove a Ford F-150 and [REDACTED] drove a Chevrolet Impala from Houston, Texas toward the South Texas Valley in Texas, to smuggle of illegal aliens.

d. On or about October 3, 2011, [REDACTED] called [REDACTED] and spoke about traveling to Robstown, Texas, to smuggle undocumented aliens to the Houston, Texas area.

e. On or about November 2, 2011, [REDACTED]  
[REDACTED]  
transported an illegal alien further into the United States when they were arrested by the Victoria County, Texas Sheriff's Department.

f. On or about November 19, 2011, [REDACTED]  
[REDACTED]  
and a male known as "Sapo" called each other using a conference call as they smuggled undocumented aliens and narcotics into the United States.

g. On or about November 20, 2011, [REDACTED]  
[REDACTED] and told [REDACTED] that [REDACTED] had already smuggled loads of aliens and narcotics being guided by "Daddy Yankee" and "Richard".

h. On or about November 21, 2011, [REDACTED]

[REDACTED]  
drove from Starr County, Texas to Houston, Texas after [REDACTED] crashed a vehicle containing undocumented aliens. [REDACTED]

remained and escorted additional aliens into the United States.

i. On or about January 20, 2012, FIDEL GALARZA CARDENAS transferred \$1,000 to [REDACTED]

j. [REDACTED] provided a vehicle to be used for alien smuggling and transport on or about January 25, 2012.

k. On or about January 26, 2012, [REDACTED] provided food and water to a guide who smuggled undocumented aliens throughout the United States.

l. On or about January 27, 2012, FIDEL GALARZA CARDENAS, [REDACTED]  
[REDACTED]  
[REDACTED] smuggled and transported twenty-one (21) undocumented aliens into and throughout the United States, including Victoria and Houston, Texas.

m. On or about January 28, 2012, FIDEL GALARZA CARDENAS met Baltazar Rosillo to deliver Juan Carlos Grangeno-Carapia, an undocumented alien smuggled into the United States, to Rosillo for transport to Dallas, Texas.

n. Throughout the dates alleged in Count One, FIDEL GALARZA CARDENAS [REDACTED]

created and manufactured a list of alien smugglers and the number of aliens they were guiding.

o. [REDACTED] paid [REDACTED]  
\$1,200 for her involvement as a "jumper" during the smuggling of aliens.

All in violation of Title 8, United States Code, Section 1324 (a)(1)(A)(v)(I).

**COUNT TWO**

From on or about July 1, 2011, and continuing through the date of this indictment, within the Southern District of Texas and elsewhere, the defendants,

**FIDEL GALARZA CARDENAS;**

[REDACTED]

defendants herein, did knowingly and intentionally combine, conspire, confederate and agree together and with each other, and with other persons known and unknown to the Grand Jury, to

commit the following offense against the United States: to possess with the intent to distribute 100 kilograms or more of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1) and (b)(1)(B)(vii).

**NOTICE OF CRIMINAL FORFEITURE**  
**(21 U.S.C. § 853)**

Pursuant to Title 21, United States Code, Section 853, as a result of the commission of a violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vii), notice is given that the defendants:

**FIDEL GALARZA CARDENAS;**



shall forfeit to the United States of America-

